

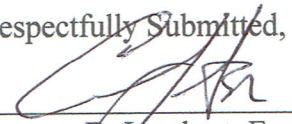
**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LASHAWNA LANE-MURRAY, as)	
Independent Administrator of the Estate of)	
SYDNI MURRAY, deceased,)	
)	
Plaintiff,)	
)	
v.)	NO: 1:17-CV-08474
)	
THE UNITED STATES &)	
JIMMY PAYTON,)	
)	
Defendants.)	

PLAINTIFF'S MOTION IN LIMINE #2

Plaintiff, Lashawna Lane-Murray, as Independent Administrator of the Estate of Sydni Murray, deceased, hereby moves in limine for an order preventing the Defendants from introducing certain irrelevant evidence or making certain statements at trial. Specifically, the Plaintiff seeks an order that Defense counsel be prevented from arguing that the recovery of the Plaintiff's estate is not subject to federal income taxes, as such evidence is irrelevant. *Hall v. Chicago and Northwestern Railway Co.*, 5 Ill.App.2d 135; *Wagner v. Illinois Central Railroad Co.*, 7 Ill.App.2d 445; *Christou v. Arlington Park Washington Race Tracks*, 104 Ill.App.3d 257, 262, 432 N.E.2d 920, 60 Ill.Dec. 21 (1982); *Siborowski v. Dressler & Assoc.*, 410 Ill.App.3d 981, 443 N.E.2d 450, 475 N.E.2d 857, 86 Ill.Dec.478 (1985)

WHEREFORE, the Plaintiff requests that the Court grant its motion and preclude the Defendants from introducing irrelevant evidence regarding the Plaintiff's estate's federal tax burden.

Respectfully Submitted,

Cannon D. Lambert, Esq.

Karchmar & Lambert, P.C.
211 W. Wacker, Ste. 1400
Chicago, IL 60606
312-977-1300
Cannon@karchmarlambert.com